

The Nova Telephone Company

P.O. Box 733
Judson, TX 75660
Office: (903) 663-0099
Fax: (903) 663-2643

June 27, 2014

Charlie D. Mattingly
President
The Nova Telephone Company
c/o VNC Enterprises
235 Dennard Street
Longview, TX 75605
P.O. Box 733
Judson, TX 75660
(903)663-0099

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: REQUEST FOR CONFIDENTIAL TREATMENT:

Connect America Fund; High Cost Universal
Service Support IN WC DOCKET NOS. 10-90, 07-
135, 05-337, 03-109, CC DOCKET NOS. 01-92,
96-45, GN DOCKET NO. 09-51, WT DOCKET NO.
10-208, BEFORE THE FEDERAL
COMMUNICATIONS COMMISSION

Dear Ms. Dortch:

Please find attached with this letter a request for confidential treatment for portions of information submitted with our company Form 481 along with four copies. Contemporaneously, we are filing a copy of the redacted Form 481, with redacted attachments, via ECFS. This information has also been filed with our state commission and electronically submitted, and certified, with the Universal Service Administration Company. If you have any questions or concerns with the attachments, please contact Charles Curtis at Charles.curtis@contagis.com or by phone at 252-514-2203.

Sincerely,



Charlie Mattingly

Cc: file

REDACTED -- FOR PUBLIC INSPECTION

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	}	
Connect America Fund	}	WC Docket No. 10-90
	}	WC Docket No. 07-135
High-Cost Universal Service Support	}	WC Docket No. 11-42
	}	WC Docket No. 05-337
Lifeline and Link Up Reform	}	WC Docket No. 03-109
	}	CC Docket No. 01-92
	}	CC Docket No. 96-45
	}	GN Docket No. 09-51
	}	WT Docket No. 10-208

REQUEST FOR CONFIDENTIAL TREATMENT

The Nova Telephone Company ("Filer") requests that the portions of its Form 481 pertaining to its Five Year Plan in the Service Quality Improvement Reporting, its Tribal Land Offerings documentation and its Rate of Return Additional Documentation (RUS Annual Report) be granted confidential, non-public treatment pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. Sections 0.457, 0.459, and related provisions of the Freedom of Information Act ("FOIA"), including 5 U.S.C. Section 552(b)(4) ("Exemption 4"). Form 481 contains information regarding the Filer's capital expenditure budgets, detailed network information as well as sensitive financial information filed in the Rate of Return Documentation. Release of such information would supply its competition sensitive commercial information that would undermine its ability to serve its customers effectively. Such information is not customarily disclosed to the public or made available within the telecommunications industry. Therefore, the Filer requests confidentiality of these respective portions of its Form 481 filing be granted. Support for the Filer's request for confidential treatment pursuant to FCC rules in Section 0.459(b) is provided as follows:

1. FILER'S FORM 481 SATISFY THE REQUIREMENTS OF SECTION 0.459 OF THE COMMISSION'S RULES

The material the Filer seeks confidentiality qualifies for the requirements outlined in Section 0.459 of the FCC's rules. As will be demonstrated, the Filer has satisfied all the elements of this section, concluding that disclosure of this information would be harmful to the Filer.

(1) Identification of the specific information for which confidential treatment is sought.

The Filer requests confidential treatment for the portions of the Form 481 required by 47 C.F.R. Section 54.313(a)(2) and (4). The Form bears the legend "CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO.'S 10-90, 07-135, 05-337, 03-109, CC DOCKETS 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATION COMMISSION." The specific information considered confidential include: 1) The Filer's 5 year capital budget and network information associated with Service Quality Improvement Reporting (100). 2) ROR Additional Documentation which represents financial reports for calendar year 2013 (3005).

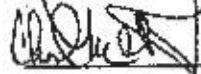
REDACTED – FOR PUBLIC INSPECTION

- (2) **Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.** The information is required to be produced annually in accordance with 47 C.F.R. Section 54.313(a). The proceedings are WC Docket No. 10-90 and WC Docket No. 11-42.
- (3) **Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.** The information requested for confidential treatment is information not customarily released to the public. Release of this information would have the effect of substantial harm to the competitive position of the Filer.
- (4) **Explanation of the degree to which the information concerns a service that is subject to competition.** All of the services provided by the Filer are subject to competition.
- (5) **Explanation of how disclosure of the information could result in substantial competitive harm.** Identification of network details could enable wrongdoers the ability to compromise network reliability to customers. In addition, competitive entities in the Filer's area would have access to sensitive network, strategic and financial details that would hamper the Filer's ability to effectively compete.
- (6) **Identification of any measures taken by the submitting party to prevent unauthorized disclosure.** The information filed is not customarily released to the public or publically made available within the telecommunications industry. The information is also only released within internal circulation, including its attorneys, consultants and engineers, held to confidentiality agreements. The request as well as the associated documents subject to it, are filed both paper copy as well as electronically.
- (7) **Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.** None of the information requesting confidential treatment is available to the public and have not been disclosed to parties unless those parties are engaged to perform services for the Filer, under non-disclosure.
- (8) **Justification of the period during which the submitting party asserts that material should not be available for public disclosure.** Due to the fact that the nature of the information being filed is sensitive in terms of competitive and public safety concerns, the Filer requests that confidential treatment be granted indefinitely.

II. CONCLUSION

For these reasons, pursuant to Sections 0.457 and 0.459 of the Commission's rules, the Filer requests that the portions of Form 481 relating to those particular items listed in I.1, above, be treated as confidential under the Commission's rules and precedent and withheld from public inspection and that any distribution of them within the Commission should be limited, in accordance with the reasons stated for confidential request. In the case where any person, party or entity wishes to access any of this information, the Filer requests immediate notification so it can have the opportunity to oppose the request or consider any other action it deems necessary to protect both its network, strategic and financial interests and the interest of the customers it continues to serve.

Respectfully Submitted,



Charlie D. Mattingly
President
The Nova Telephone Company
c/o VNC Enterprises
235 Dennard Street
Longview, TX 75605
P.O. Box 733
Judson, TX 75660
(903)663-0099

June 27, 2014

Form 481 Carrier Annual Reporting

Date: 1/11/2016

<010>	Study Area Code	308644
<015>	Study Area Name	LINE 3072A TEL CO
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Stephanie Curtie
<035>	Contact Telephone Number: Number of the person identified in data line <030>	2525147283 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	stephanie@contagie.com

ANNUAL REPORTING OF SERVICE QUALITY

<100>	Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> ← check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input type="text"/>	<input checked="" type="checkbox"/>
<310>	Detail on Attempts (voice)	<input type="text"/>	<input type="text"/>	<input checked="" type="checkbox"/>
		(attach descriptive document)		
<320>	Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input type="text"/>	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband)	<input type="text"/>	<input type="text"/>	<input checked="" type="checkbox"/>
		(attach descriptive document)		
<400>	Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410>	Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440>	Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450>	Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	<input type="text" value="308644ch510.pdf"/>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	<input type="text" value="308644ch610.pdf"/>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	<input type="text" value="308644ch1010.pdf"/>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100>	Terrestrial Backhaul (Y/N)?	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>		(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>		(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>		(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet				
<3000>		(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>		(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(100) Service Quality Improvement Reporting
Data Collection Form

FCC Form 487

OMB Control No: 3060-0986/OMB Control No: 3060-0819

July 2013

<010>	Study Area Code	202644
<015>	Study Area Name	THE HOWA TEL CO
<020>	Program Year	2013
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Curtis
<035>	Contact Telephone Number - Number of person identified in data line <030>	2525142285 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephanie@contagis.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing § 54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

2013480r112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

FCC Form 473
OMB Control No. 3050-0046/DIB Control No. 3050-0019
July 2013

[illegible]

2025/2516

Page 6

<010>	Study Area Code	30644
<015>	Study Area Name	THE KONA TEL CO
<020>	Project Year	2015
<050>	Contact Name - Person USAC should contact regarding this data	Stephanie Garcia
<015>	Contact Telephone Number - Number of person identified in data line <070>	25314220; ext.
<030>	Contact Email Address - Email Address of person identified in data line <030>	stephenl@gpsaanglo.com

[illegible]

<010>	Study Area Code	330644
<015>	Study Area Name	THE KWANA UTI CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Curtin
<035>	Contact Telephone Number - Number of person identified in data line <030>	2527142203 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephanie@contingentia.com
<810>	Reporting Carrier	The Kwan Telephons Company
<811>	Holding Company	VNC Enterprises, LLC
<812>	Operating Company	

Page 6

POB Tribal Lands Reporting
Data Collection Form
USAC ID: 03257017
Form ID: 0300-0001

<010>	Study Area Code	303644
<015>	Study Area Name	THE KONA TEL DC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Curtis
<035>	Contact Telephone Number - Number of person identified in data line <030>	2525142203 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephanie@konoaia.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) Includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, NA)

1100) No terrestrial backhaul reporting
Data Collection Form
OMB Control No. 3067-9985/O-1
E-Collection No. 3067-9985/O-1
Rev. 2015

<010>	Study Area Code	383546
<015>	Study Area Name	THE NOVA TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Geophane Curtis
<035>	Contact Telephone Number - Number of person identified in data line <030>	2523142203 (WV)
<039>	Contact Email Address - Email Address of person identified in data line <030>	geophane@montesqis.com

Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

<1200> Terms and Conditions for Lifeline Customers
 Lifeline
 Data Collection Form

<010> Study Area Code 300544
 <015> Study Area Name TWIN MOUNTAIN TEL CO
 <020> Program Year 2012
 <030> Contact Name - Person USAC should contact regarding this data Stephanie Conley
 <035> Contact Telephone Number - Number of person identified in data line <030> 2525-42203 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> stephanie.conley@twmco.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

300544cb1210.pdf

Name of Attached Document

<1220> Link to Public Website HTTP

*Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support. Carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers. ☒
- <1222> Details on the number of minutes provided as part of the plan. ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(b)(3)(C) - Confidentiality of Information
 This form is for use by the community anchor institution only. It is not to be distributed to the public.
 This form is for use by the community anchor institution only. It is not to be distributed to the public.

<010>	Study Area Code	302644
<015>	Study Area Name	TRF ROMA TSC CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Dupin
<035>	Contact Telephone Number - Number of person identified in data line <030>	252542260 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephanie.dupin@usac.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting		
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1))	<input type="checkbox"/>
<2011>	3rd Year Certification (47 CFR § 54.313(b)(2))	<input type="checkbox"/>
Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.313(a))		
<2012>	2013 Frozen Support Certification	<input type="checkbox"/>
<2013>	2014 Frozen Support Certification	<input type="checkbox"/>
<2014>	2015 Frozen Support Certification	<input type="checkbox"/>
<2015>	2016 and future Frozen Support Certification	<input type="checkbox"/>
Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))		
<2016>	Certification Support Used to Build Broadband	<input type="checkbox"/>
Connect America Phase II Reporting (47 CFR § 54.313(e))		
<2017>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2018>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>
<2021>	Interim Progress Community Anchor Institutions	

Name of Attached Document Listing Required Information

Page 21

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Page 17

Carrier Name - Agency/Carrier	CAV Control No. (NARS/USPS/USPS/USPS/USPS)
Data to be Reported	

<010> Study Area Code	303644
<011> Study Area Name	TRE NOVA TEL CO
<012> Program Year	2015
<013> Contact Name - Person USAC should contact regarding this data	Stephanie Curtis
<035> Contact Telephone Number - Number of person identified in data line <030>	2525142203 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	stephanie@usac2a212.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: TRE NOVA TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: 303644	Filing Due Date for this form: 07/01/2014
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: TRE NOVA TEL CO	
Name of Authorized Agent or Employee of Agent: Charles D. Mattingly	
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date: _____
Printed name of Authorized Agent or Employee of Agent: Charles D. Mattingly	
Title or position of Authorized Agent or Employee of Agent: President	
Telephone number of Authorized Agent or Employee of Agent: 9336650399 ext.	
Study Area Code of Reporting Carrier: 303644	Filing Due Date for this form: 07/01/2014
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

REDACTED-FOR PUBLIC INSPECTION

Attachments

[illegible]

REDACTED-FOR PUBLIC INSPECTION

<010>	Study Area Code	390614
<015>	Study Area Name	THE NOVA 350, C2
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding the data	Devonian Ly Curtis
<035>	Contact Telephone Number - Number of person identified in data line <010>	2125142583 ext. 400
<038>	Contact Email Address - Email address of person identified in data line <010>	noynovale@contango18.com

[illegible]

REDACTED-FOR PUBLIC INSPECTION

THE NOVA TELEPHONE COMPANY, INC.

2014 FIVE YEAR PLAN IN ACCORDANCE WITH SECTION 54.202(a)(1)(ii) OF FCC RULES



REDACTED-FOR PUBLIC INSPECTION

COMPANY
SAC
YEAR COMPLETED

NOVA TELEPHONE COMPANY
300644
2014

	CLI	Square Miles	Population	Growth
WIRE CENTER 1				
WIRE CENTER 2				
WIRE CENTER 3				
WIRE CENTER 4				
WIRE CENTER 5				
WIRE CENTER 6				
WIRE CENTER 7				
WIRE CENTER 8				
WIRE CENTER 9				
WIRE CENTER 10				

REDACTED-FOR PUBLIC INSPECTION

SAC
YEAR FILED

300644
2014

Square Miles
Population

Year 1

Year 2

Year 3

Year 4

Year 5

Planned GS Investment
Planned COE Investment
Planned Cable & Wire Investment
Total Planned Investment

Affected Area (Sq. Mi.)
Affected Population



300544
NOVAQH
2014

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Total Population	Planned General Support Investment	Planned Central Office Investment	Planned Cable & Wire Investment	Total Planned Investment	Affected Population	Affected Area (Sq. MI.)	% Subs	% Area
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total Square Mileage	[REDACTED]							

The Nova Telephone Company

Study Area Code: 300644

Response to Line 510 – Service Quality Standards and Consumer Protection Rules

Surpasses PUC minimum service quality standards – The Nova Telephone Company (“Filer”) hereby certifies that its voice service surpasses the minimum standards required by the Public Utilities Commission of Ohio (“PUCO”) for eligible telecommunications carriers. Over the history of the Filer’s provision of voice services to its customer, it has consistently exceeded those minimum standards.

Publically available rates, terms and conditions - Once more, the Filer’s rates, terms and conditions for voice service are publically available through OCC approved local exchange tariffs.

Protection of consumer information - The Filer complies with the Federal Communications Commission Consumer Proprietary Network Information (“CPNI”) rules (47 C.F.R. Sections 64.2001-64.2011). The compliance is assured through certification for CPNI compliance by March 1 of each year, In addition to its own internal company procedures. The Filer also complies with all consumer protection rules applicable by State law.

Broadband service rates, quality service standards - The Filer offers wholesale broadband to an unaffiliated third party, rather than retail to its end users. It assures the third party that it provides speeds associated with service plans purchased through its interstate tariff. For example, for lines that subscribe at speeds up to a download speed and upload speed, those speeds are provided. However, those speeds are based on a ‘best effort’ basis, due to the fact there are several aspects of the broadband network, outside of the Filer’s control, that can effect throughput speeds. The interstate tariffs are publically available for rates, terms and conditions. Once more, the Filer has internal procedures to assure that quality of service to broadband customers exceeds expectations. Therefore, although there are no current broadband service quality standards and consumer protection rules, the Filer discloses its rates, terms and conditions of service to its customers. Lastly, the Filer complies with applicable federal and state customer protection standards for all businesses in Ohio.

The Nova Telephone Company

Study Area Code: 300644

Response to Line 610 – Ability to Function in Emergency Situations for Voice and Broadband

The Nova Telephone Company (“Filer”) certifies that it is able to function in emergency situations as set forth in both federal and state regulations.

Power - The Filer’s network is designed to remain functional in emergency situations where no external power is available. In such cases, the Filer has eight hours of battery backup power for its wire center and field electronics locations. The wire center is also equipped with backup power generators and automatic transfer switches. In addition, the Filer has access to mobile backup generators in case of backup power failure.¹

Routing and Spikes – The Filer has alternate routes configured in each of its local switch to assure that when the primary routes are down, traffic is re-routed to alternate routes and facilities. In addition, the Filer has overflow routes where traffic spikes may compromise the primary route traffic flows.

Procedures for voice and data - The Filer has internal procedures for emergency situations which includes emergency operations planning. Such procedures and network infrastructure utilized for emergency situations is offered as such for both voice and broadband services.

¹ Section 54.202(a)(2)

The Nova Telephone Company

Study Area Code: 300644

Response to Line 1010 – Voice Services Rate Comparability

The Wireline Competition Bureau has released its reasonably comparable voice benchmark rate including local residential rate, interstate end user common line charge, any applicable state end user common line charges, mandatory extended area service charges and state universal service charges. The Filer certifies that the combination of all applicable charges stated herein fall below the federal benchmark rate. The Filer discloses its rates, by exchange, in line 700 of the Form 481, demonstrating its rate levels compared to the federal benchmark.

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